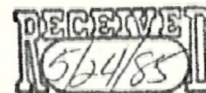




# J-U-B ENGINEERS, INC.

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May 21, 1985



Ms. Lori Cohen  
Superfund Management Section  
U.S.E.P.A. - Region X  
1200 Sixth Ave.  
Seattle, WA 98101

Subject: Proposed Sampling Plan - Pasco Sanitary Lanfill

Dear Ms. Cohen:

At the request of Mr. Larry Dietrich, of the Pasco Sanitary Landfill, I have reviewed the subject plan. This letter provides my comments on the draft sampling plan submitted by Ecology and Environment, Inc. The comments incorporate the modifications to the plan as discussed in our May 8, 1985 meeting.

\* I understand you will resurvey all existing wells, measure groundwater elevations in the old and new wells, and provide priority pollutant 2,4,-D and MCPA analysis on all wells this summer. *add 2,4,5-T & Silvex*

\* Given the above, I would request that all new wells be placed 20' into the aquifer and screened comparably to the old wells to allow valid comparisions. *Yes! Will do*

\* I am in general agreement with the spatial arrangement of the E & E wells, as proposed in Figure 2.3. One exception is the placement of EE-3. This well is located in an area that was used for open burning for a 4-5 year period. Since the ash would contain concentrated materials, any analysis of this material may give misleading results relative to what could potentially be moving from site A. More importantly, the area was also used for the disposal of construction debris, tree stumps, and a variety of large bulk items that could not be disposed of in the fill. These materials would make drilling in this area with a hollow stem auger nearly impossible. This is the reason we located our well 2 across the road and I would suggest you do likewise. I would request that none of the wells be located any closer than 30' to the boundary of any of the industrial disposal sites, to avoid creating any induced pathway for migration of materials.

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- \* I would request that soil samples be taken during the augering at 5' increments, each sample be identified and stored separately, and each sample be provided to J-U-B.
- \* I would suggest that analysis be performed on the composite ~~10~~ 5-20' depth EE1, EE4 and EE5. This would allow comparisons between site B and the control without having to deal with 2,4,-D present in the surface soils from agricultural operations. The circles adjacent to this site have probably been repeatedly sprayed with 2,4,-D and aerial drift to the EE1, 4 and 5 locations is a certainty.
- \* The control soils should be analyzed on a composite basis ~~5-30'~~, as should EE2, 3, 6-9. Again, this would provide uniformity.
- \* I find the investigation strategy flow chart Figure 1.1 most interesting. Even if negative results are obtained on the water and soils, the only subsequent step is to "Recommend Design of Long Term Monitoring Study". I would hope that the installation of these wells would not automatically mean continued long term monitoring without reason. The cost of monitoring at all these locations even yearly would be expensive and not necessarily warranted.
- \* It is interesting to note the amount of information on site history and how the work will be performed and how this contrasts with the absolute lack of policy concerning the evaluation of the results. The objectives of the study are to determine if hazardous materials have migrated from the disposal area and if further investigation of the site is necessary. I can see where some judgement is involved in determining if materials have migrated and I would not expect you to prove statistically significant differences between parameters at different areas at this stage of the investigation. However, if drinking water standards and water quality criteria are being met in the groundwater within 30' of each area, wouldn't this preclude further investigation of the site? I think, at least, this much policy should be clarified before the study is initiated.

Yes, but 99th  
10' increments

good pt.  
agreed 99th

Yes, but  
see plan for  
specifics  
depending on what is found  
may recommend sampling  
only 1 well from each  
burial zone every  
2 or 3 or even 5 yrs

EJE Chem + Concor  
however EPA sets action  
levels.

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In general the sampling plan provides an excellent historical account of the site, a good compilation of the previous work performed and a well thought out plan for conducting the work. I'm hopeful you will answer my questions on the policy issue.

I appreciate the opportunity to comment on this sampling plan.

Sincerely,



John A. Zillich  
Waste Management &  
Environmental Specialist

JAZ/ss

cc: Carl Nuecherlien - DOE, Spokane  
Larry Peterson - DOE, Spokane  
Stan Vendetti - Benton Franklin Health Department  
Andy Hafferty - E & E